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LG Electronics U.S.A., Inc.,
and LG Electronics, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LG ELECTRONICS U.S.A., INC.,
and LG ELECTRONICS, INC.,

Plaintiffs,

v.

WHIRLPOOL CORPORATION,

Defendant.

DOCUMENT ELECTRONICALLY FILED

Civil Action No. 04-2306 (WHW/SDW)

**REPLY OF LG TO WHIRLPOOL'S
AMENDED COUNTERCLAIMS**

LG Electronics U.S.A., Inc. and LG Electronics, Inc. (collectively "LG") hereby reply to the Amended Counterclaims of Whirlpool Corporation ("Whirlpool"). The paragraphs of LG's reply are numbered to correspond to the paragraphs of Whirlpool's Amended Counterclaims.

As to Jurisdiction and Venue

- 48. LG admits the allegations of paragraph 48.
- 49. LG admits the allegations of paragraph 49.
- 50. LG admits the allegations of paragraph 50.

As to the Parties

51. LG admits the allegations of paragraph 51.

52. LG admits the allegations of paragraph 52.

53. LG admits the allegations of paragraph 53.

As to Counterclaim I – Non-infringement of the ‘731 Patent

54. LG incorporates by reference its answers to the allegations in paragraphs 48 through 53 as set forth above.

55. LG denies the allegations of paragraph 55.

As to Counterclaim II – Non-infringement of the ‘886 Patent

56. LG incorporates by reference its answers to the allegations in paragraphs 48 through 55 as set forth above.

57. LG denies the allegations of paragraph 57.

As to Counterclaim III – Non-infringement of the ‘474 Patent

58. LG incorporates by reference its answers to the allegations in paragraphs 48 through 57 as set forth above.

59. LG denies the allegations of paragraph 59.

As to Counterclaim IV - Invalidity of the ‘731 Patent

60. LG incorporates by reference its answers to the allegations in paragraphs 48 through 59 as set forth above.

61. LG denies the allegations of paragraph 61.

As to Counterclaim V - Invalidity of the ‘886 Patent

62. LG incorporates by reference its answers to the allegations in paragraphs 48 through 61 as set forth above.

63. LG denies the allegations of paragraph 63.

As to Counterclaim VI - Invalidity of the '474 Patent

64. LG incorporates by reference its answers to the allegations in paragraphs 48 through 63 as set forth above.

65. LG denies the allegations of paragraph 65.

As to Counterclaim VII - Unenforceability of the '886 Patent

66. LG incorporates by reference its answers to the allegations in paragraphs 48 through 65 as set forth above.

67. LG denies the allegations of paragraph 67.

68. LG denies the allegations of paragraph 68.

69. LG denies the allegations of paragraph 69.

70. LG denies the allegations of paragraph 70.

71. LG denies the allegations of paragraph 71.

72. LG denies the allegations of paragraph 72.

73. LG denies the allegations of paragraph 73.

As to Counterclaim VIII - Unenforceability of the '474 Patent

74. LG incorporates by reference its answers to the allegations in paragraphs 48 through 73 as set forth above.

75. LG denies the allegations of paragraph 75.

76. LG denies the allegations of paragraph 76.

77. LG denies the allegations of paragraph 77.

78. LG denies the allegations of paragraph 78.

79. LG denies the allegations of paragraph 79.

80. LG denies the allegations of paragraph 80.

81. LG denies the allegations of paragraph 81.

82. LG denies the allegations of paragraph 82.

WHEREFORE, LG prays that the Court:

- A. Dismiss Whirlpool's Amended Counterclaims with prejudice;
- B. Grant all relief requested by LG in its Complaint; and
- C. Award LG such further relief as the Court deems just and proper.

**GIBBONS, DEL DEO, DOLAN,
GRIFFINGER & VECCHIONE,**
A Professional Corporation

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